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GLOBAL MARITIME COMMUNICATIONS SYSTEMS, INC. 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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27 May 93

JUN 10 1993

Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

FCC - MAIL ROOM

In the matter of :

PR Docket No. 92-257

Amendment of the Commission's
Rules Concerning Maritime Communications

RM-7956
RM-8031

Comment of GLOBAL MARITIME COMMUNICATIONS SYSTEMS, INC. in
the Notice of Proposed Rule Making and Notice of Inquiry.

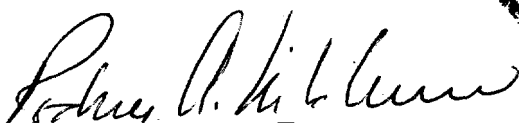
INTRODUCTION

Global Maritime Communication Systems, Inc. (GMCSI) hereby submits
its comments in the above matters.

GMCSI is a for-profit corporation and telecommunications company
formed to develop, own and operate certain electronic communications
systems utilizing Digital Selective Calling (DSC) technology in the
150MHz radio frequencies.

Thank you for your consideration in review of the following commentary.

Sincerely,



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**Comment of GLOBAL MARITIME COMMUNICATIONS SYSTEMS, INC. in
the Notice of Proposed Rule Making and Notice of ~~January~~ 1993**

Par 12

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Telecommunications requirements needed in the next 10-15 years

As we view the expansion of the Land Mobile telecommunications and the growing public awareness of the many new and enhanced services this growth has provided, we fully expect a demand for these new services in any future VHF Maritime systems that serve this same customer. Certainly competition from the Land Mobile services will continue as long as the Coast Station providers offer outdated manual type service in limited areas. We see a growing need to establish a national VHF Maritime Coast Station Service, operating under an established and agreed upon DSC protocol. These new stations created from existing coast stations and private coast stations could offer services to both the boating community and land mobile users. Services specifically required by the Maritime service, such as safety can be provided. There should also be increased demand for VTS alarm/monitoring functions, fax, packet data networks, privacy, and position locating services. The introduction of the PC into the radio channel has created a host of new services commonly called "advanced message services" such as voice mail, custom information offering, locating service and a host of "Class" type services now available due to the new telephone interface offerings. Certainly many types of service now available to the land mobile customer can be offered to the public over the Maritime public/private coast channels. Cellular service has not caused the demise of those SMR systems that were able to offer competitive service.

Increased services will be required to meet the ever expanding boating community needs. Certainly this will require more efficient services and additional radio channels.

These demands can be met by

1. converting to NBFM (12.5KHz)
2. use of trunking
3. limited channel sharing
4. nation wide interoperability-open networks

We feel that the Cellular providers offer their service to the boaters by default. Once the VHF Maritime providers can offer competing services and provide those services to both Maritime and Land based customers while at the same time complying with any required safety provisions, the VHF boating customer will return to using Maritime service.

Cellular providers do not design their systems to meet the coverage needs of the boaters but rather the needs of the hi density land traffic. Therefore those boaters who may now enjoy cellular service 40-50 miles off shore may no longer have coverage when the cellular systems go to small cells and coverage is reduced to a few miles.

Par 14

Trunking

We support the move towards requiring trunking in the VHF Public/Private coast stations as one of the means to improve spectrum efficiency. We also feel that the commission should require some sort of minimum trunking capability for those public coast stations which utilize more than three correspondence channels. For those coast stations using less than three correspondence channels the commission should require they be automatically interconnected to the telephone network without the requirement for direct manual operator patching. Both of these coast stations could use DSC as the standard protocol. In the event of channel splitting where additional channels are derived, these additional channels could be assigned only to those existing coast stations that employ some sort of trunking mode.

Par 15

Digital Selective Calling

The Commission should require minimum DSC capability for all marine radios and mandate the DSC protocol as the only selective calling technique to be used in the VHF public coast stations. DSC has already been established by international organizations such as the ITU and IMO as the only recognized selective calling format for maritime communications worldwide. The Commission should not allow the establishment of "Private systems" on the Public correspondence channels. All public coast stations should remain "open" to all users without the requirement of obtaining any special equipment or special entry instructions from a group of or from a single coast station operator. Mandating the DSC protocol as the only protocol for automatic interconnection with the telephone network will provide the "open network".

We agree that the cost of the mobile radio may at first increase for those units capable of the automatic DSC interconnection over those units that are simply "add on" devices, but certainly these costs will follow the path of the cellular units once system usage rates increase and more than one or two manufacturers produce DSC units. DSC is already a mandatory requirement for radios carried to meet GMDSS requirements, and manufactures will certainly be producing full DSC radios in any event.

If there is ever any hope for establishment of a national VHF Coast station system in the US it will come about only thru the establishment of a mandated system protocol.

Par 21

Private carriers

Allowing Private coast stations to become private carriers and pre-empting them from the
~~State and local governments jurisdiction may put these private stations in direct~~

Par 18

Proposed Rules that Require DSC

We agree with the USCG that unless we require a minimum DSC capability for ALL VHF marine radios, marine collisions will increase as a direct result of reduced Ch 16 watch. All new VHF radios installed after 1997 should contain the capability as suggested in the matrix under VHF SC101. This should include all add-on devices. We feel that requiring ALL marine radios to have these minimum capabilities will increase the cost of the radios by approximately \$50 to \$75 per unit while requiring only certain radios be equipped will increase the per unit cost to manufacture a smaller number by about twice the amount.

Par 37

Private Land Use of Marine Frequencies

We oppose the primary allocation of VHF Public Coast Station Frequencies to I/LT service providers. Rather, we would support the use of these frequencies by Public Coast Stations to provide I/LT services on a secondary basis. If the Commission allows the use of Public Coast Stations Frequencies to serve the Land Mobile customers on a regular basis, construction of new Private Land systems may restrict the ability of Public Coast stations to move further inland. Certainly the incentive for full development and expansion of the market by the Public Coast Station operators will be spoiled. The hope of ever having a National Maritime system interconnected and serving all inland waterways and Land Mobile customers may be dashed due to these large private users. We do not take issue with the separation table limits but with the loss of relatively clear channels over large land areas. The "Refarming" of the Private land service now being considered could result in these Public Coast frequencies becoming available to other than Industrial/Land transportation usage.